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9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13
14 KIM MICHELE PADILLA,) Civil No. 4:16-cv-04135-KAW
15 Plaintiff,)
16 v.) **STIPULATION AND PROPOSED ORDER**
17 NANCY A. BERRYHILL,) **FOR A SECOND EXTENSION OF TIME**
18 Acting Commissioner of Social Security,) **FOR DEFENDANT TO FILE HER**
19 Defendant.) **MOTION FOR SUMMARY JUDGMENT**
20 _____)

21 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and
22 with the approval of the Court, that Defendant shall have a second extension of time of 30 days
23 to file her motion for summary judgment. Defendant has reviewed the contentions in Plaintiff's
24 MSJ and respectfully requests this additional time to consider the possibility to voluntary remand
25 in lieu of further litigation.

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28 Stipulation to Extend Def.'s MSJ

The new due date for Defendant's motion for summary judgment will be Monday, January 15, 2018.

Respectfully submitted,

Date: *December 15, 2017*

By: /s/ Lisa Susan Douglass*
LISA SUSAN DOUGLASS
** By email authorization on Dec. 14, 2017*
Attorney for Plaintiff

Date: *December 15, 2017*

BRIAN J. STRETCH
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Special Assistant United States Attorney
Attorneys for Defendant

Of Counsel
Jeffrey Chen
Assistant Regional Counsel
Social Security Administration

ORDER

APPROVED AND SO ORDERED:

DATED: 12/19/17

Kandis Westmore
HONORABLE KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE

Stipulation to Extend Def.'s MSJ